

Exhibit A

**Department of
Environmental
Conservation****KATHY HOCHUL**
Governor**SEAN MAHAR**
Interim Commissioner

January 22, 2025

Ed Hannon
Northrop Grumman
925 South Oyster Bay Road
Bethpage, NY 11714

Re: Northrop Grumman Bethpage Facility – OU3 Data Gap Sampling Plan
(NYSDEC Site# 130003A)

Dear Mr. Hannon:

This letter contains points of clarification discussed during our January 13, 2025 meeting regarding Northrop Grumman's follow-up technical questions on the New York State Department of Environmental Conservation (DEC) November 27, 2024 OU3 Data Gap Sampling Plan correspondence (November Letter).

In our January meeting, Northrop Grumman expressed concern that more information was needed about the assumptions and mathematical analysis used in the evaluation of the 3D model and geostatistical evaluation in the sampling plan described in the November Letter. As discussed, DEC has already begun sharing the relevant model files with Northrop Grumman for review. DEC is confident that its rigorous analysis fulfills the goal of highlighting areas of uncertainty within the spatial data set that warrant further discussion.

As stated in the November Letter, the soil sampling plan that was submitted by Northrop Grumman in September 2024 meets the minimum requirements set forth in the 2013 OU3 Record of Decision (ROD), which Northrop Grumman is legally required to implement per the 2014 Consent Decree. The plan outlined in the November Letter is an approach that would allow the parties to refine and ultimately agree on a finalized sampling program.

The November Letter recounts that the Town of Oyster Bay and Northrop Grumman must agree on a PCB cleanup standard for the Bethpage Community Park in order to jointly submit a risk-based disposal application to EPA for its review and approval. To help facilitate this, DEC developed and shared a plan to understand a cleanup to unrestricted soil cleanup objectives (SCOs). Following conversation with the Town of Oyster Bay, DEC believes that such a plan would provide information vital for Northrop Grumman and the Town of Oyster Bay to reach a cleanup agreement for the risk-based disposal application. As also stated in the November Letter, based on our previous conversations, DEC

anticipated receiving a sampling plan from Northrop Grumman that described delineations to multiple PCB SCOs, including the New York State unrestricted use SCO of 0.1 ppm for PCBs. The November Letter goes on to conclude that, "As the Department's sampling program was generated with the support of data analysis software, the Department welcomes an in-depth discussion to finalize sampling locations for Northrop Grumman to implement." This demonstrates that the referenced data gap soil sampling plan was shared in an effort to help Northrop Grumman and the Town of Oyster Bay reach an agreement on a final soil sampling plan.

It has been nearly two months since DEC submitted a sampling program for Northrop Grumman review to understand the full range of cleanup options, including a cleanup to the unrestricted SCOs. In an effort to complete the data gap sampling in the area outside of the ballfield by May 1, 2025 when the Town Pool begins to open, as well as expedite the ultimate cleanup of the PCB contaminated soil, DEC supports development of a separate data gap soil sampling plan for the area outside of the ballfield. This area is smaller than the ballfield, contains much lower PCB soil concentrations, and the contamination does not extend as deep beneath the ground surface as in the ballfield. Considering this, a data gap soil sampling plan for the areas outside of the ballfield can likely be developed and agreed upon in the coming weeks and the soil sampling started shortly thereafter.

Thank you for your continued attention to this matter. If you have additional questions, please contact me at (518) 402-9814.

Sincerely,



Jessica LaClair
Section Chief

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